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**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF UTAH – CENTRAL DIVISION**

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ZOOBUH, INC.,

Plaintiff,

vs.

SAVICOM, INC., DBA MINDSHARE  
DESIGN, a California entity; DG  
INTERNATIONAL LIMITED, a foreign  
entity; DG INTERNATIONAL LIMITED,  
LLC, a Delaware entity; and SYLVIA VAN  
BAEKEL, an individual,

Defendants.

**DECLARATION OF SYLVIA VAN  
BAEKEL**

Civil No. 2:17-cv-1098

Judge Jill Parrish

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I, Sylvia van Baekel, declare:

1. I am the Director of DG International Limited LLC (“DG LLC”) which is a single-member LLC organized under the laws of Delaware, with its principal place of business located at Trolley Square, Suite 20C, New Castle, Delaware 19806.

2. I submit this declaration in support of the Motion to Withdraw as Counsel for DG LLC filed by the law firm of Snow, Christensen & Martineau and firm lawyers Scott Young and Maralyn English, and the law firm of Klein Moynihan Turco LLP and firm lawyer Brian Astrup (collectively “Counsel”).

3. DG LLC has requested that Counsel withdraw from this case.

4. DG LLC does not have the financial resources to continue to pay its Counsel and has instructed Counsel to cease working on this matter.

5. DG LLC is currently evaluating the company’s future.

6. Counsel has informed DG LLC as to the effect of a default judgment.

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 29<sup>th</sup> day of June, 2018.

A handwritten signature in black ink, appearing to read 'Sylvia van Baekel', written over a horizontal line.

Sylvia van Baekel